

CALIFORNIA CIVIL RIGHTS LAW GROUP

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Attorneys for Plaintiffs,
DEMERIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMERIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

V.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive.

Defendants.

Case No. 3:17-cv-06748-WHO

**SUPPLEMENTAL DECLARATION OF
LAWRENCE ORGAN IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT CITISTAFF SOLUTIONS,
INC.'S MOTION FOR SUMMARY
JUDGEMENT, OR IN THE
ALTERNATIVE FOR SUMMARY
ADJUDICATION OF ISSUES**

Date: October 23, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 201

1 I, LAWRENCE ORGAN, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Supplemental Declaration
5 in support of Plaintiffs' Opposition to Defendant's Motion for Summary Judgment. I have
6 personal knowledge of the facts stated herein and if called upon to testify, I could and would
7 competently testify thereto, except as to those matters that are stated upon information and belief.

8 2. Exhibit A, filed under seal, consists of true and correct copies of documents
9 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped CITISTAFF-
10 000034 to CITISTAFF-000035. Defendant marked this document as "confidential" pursuant to
11 the Protective Order, and the document should therefore be sealed pursuant to this Order.

12 3. Exhibit B, filed under seal, is a true and correct copy of a document produced by
13 Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped CITISTAFF-000043.
14 Defendant marked this document as "confidential" pursuant to the Protective Order, and the
15 document should therefore be sealed pursuant to this Order.

16 4. Exhibit C, filed under seal, is a true and correct copy of a document produced by
17 Defendant Nextsource, Inc. in discovery and Bates-stamped NS000004. Defendant marked this
18 document as "confidential" pursuant to the Protective Order, and the document should therefore
19 be sealed pursuant to this Order.

20 5. Exhibit D, filed under seal, consists of a true and correct copy of various experts
21 from the deposition of Owen Diaz. Defendant marked this document as "confidential" pursuant
22 to the Protective Order, and the document should therefore be sealed pursuant to this Order.

23 6. Exhibit E, filed under seal, is a true and correct copy of a document produced by
24 Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000511. Defendant marked this

1 document as "confidential" pursuant to the Protective Order, and the document should therefore
2 be sealed pursuant to this Order.

3 7. Exhibit F, filed under seal, is a true and correct copy of a document produced by
4 Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000510. Defendant marked this
5 document as "confidential" pursuant to the Protective Order, and the document should therefore
6 be sealed pursuant to this Order.

8 8. Exhibit G, filed under seal, consists of true and correct copies of documents
9 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000667 to TESLA-
10 0000671. Defendant marked this document as "confidential" pursuant to the Protective Order,
11 and the document should therefore be sealed pursuant to this Order.

13 9. Exhibit H, filed under seal, consists of true and correct copies of documents
14 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000314 to TESLA-
15 0000316. Defendant marked this document as "confidential" pursuant to the Protective Order,
16 and the document should therefore be sealed pursuant to this Order.

17 10. Exhibit I, filed under seal, is a true and correct copy of various excerpts from the
18 deposition of Demetric Di-Az. Defendant marked this document as "confidential" pursuant to the
19 Protective Order, and the document should therefore be sealed pursuant to this Order.

21 11. Exhibit J, filed under seal, is a true and correct copy of various excerpts from the
22 deposition of Lamar Patterson. Defendant marked this document as "confidential" pursuant to
23 the Protective Order, and the document should therefore be sealed pursuant to this Order.

25 12. Exhibit K, filed under seal, is a true and correct copy of a document produced by
26 Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-000060. Defendant marked this
27 document as "confidential" pursuant to the Protective Order, and the document should therefore
28 be sealed pursuant to this Order.

1 13. Exhibit L, filed under seal, is a true and correct copy of a document produced by
2 Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000626. Defendant marked this
3 document as "confidential" pursuant to the Protective Order, and the document should therefore
4 be sealed pursuant to this Order.

5 14. Exhibit M, filed under seal, consists of true and correct copies of documents
6 produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000138 through
7 NS000139. Defendant marked this document as "confidential" pursuant to the Protective Order,
8 and the document should therefore be sealed pursuant to this Order.

9 15. Exhibit N, filed under seal, consists of true and correct copies of documents
10 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped CITISTAFF-
11 0000050 through CITISTAFF-0000055. Defendant marked this document as "confidential"
12 pursuant to the Protective Order, and the document should therefore be sealed pursuant to this
13 Order.

14 16. Exhibit O, filed under seal, consists of true and correct copies of documents
15 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped CITISTAFF-
16 0000004 through CITISTAFF-0000005. Defendant marked this document as "confidential"
17 pursuant to the Protective Order, and the document should therefore be sealed pursuant to this
18 Order.

19 17. Exhibit P, filed under seal, consists of true and correct copies of documents
20 produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000038 –
21 NS000045. Defendant marked this document as "confidential" pursuant to the Protective Order,
22 and the document should therefore be sealed pursuant to this Order.

23 18. Exhibit Q, filed under seal, consists of true and correct copies of documents
24 produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000095 through

1 NS000100. Defendant marked this document as "confidential" pursuant to the Protective Order,
2 and the document should therefore be sealed pursuant to this Order.

3 19. Exhibit R, filed under seal, is a true and correct copy of a document produced by
4 Defendant nextSource, Inc. in discovery and Bates-stamped NS000014. Defendant marked this
5 document as "confidential" pursuant to the Protective Order, and the document should therefore
6 be sealed pursuant to this Order.

7 20. Exhibit S, filed under seal, consists of true and correct copies of documents
8 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped CITISTAFF-
9 0000009 through CITISTAFF-0000010. Defendant marked this document as "confidential"
10 pursuant to the Protective Order, and the document should therefore be sealed pursuant to this
11 Order.

12 21. Exhibit T, filed under seal, consists of true and correct copies of documents
13 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000321 through
14 TESLA-0000323. Defendant marked this document as "confidential" pursuant to the Protective
15 Order, and the document should therefore be sealed pursuant to this Order.

16 22. Exhibit U, filed under seal, consists of true and correct copies of documents
17 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped TESLA-
18 0000001 through TESLA-0000003. Defendant marked this document as "confidential" pursuant
19 to the Protective Order, and the document should therefore be sealed pursuant to this Order.

20 23. Exhibit V, filed under seal, consists of true and correct copies of documents
21 produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000175 through
22 NS000178. Defendant marked this document as "confidential" pursuant to the Protective Order,
23 and the document should therefore be sealed pursuant to this Order.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed on October 2, 2019 in San Anselmo, California.
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5 DATED: October 2, 2019

By: /s Lawrence Organ

6 Lawrence A. Organ, Esq.

7 Navruz Avloni, Esq.

Attorneys for Plaintiffs

8 DEMETRIC DI-AZ AND OWEN DIAZ
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